

## Dickens, Brian

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**From:** Dickens, Brian  
**Sent:** Wednesday, October 11, 2017 9:41 AM  
**To:** Kavalec, James; 'Brad, Miller'  
**Cc:** Letuchy, Alexandra; Marshall, Sarah  
**Subject:** Maverick, Blue Ash (Hamilton Co)

Jim and Brad:

EPA issued an NOV to Maverick in Blue Ash, OH, in March 2015.

During our work on the case we noticed Maverick's May 25, 2001 Permit to Install Application and Hamilton County's June 22, 2001 letter notifying the facility that a PTI was not needed. Based on our view, it seems this may have been an error. EPA (enforcement) believes the de minimis provision requires:

- 1) Each source has the potential to emit (uncontrolled) or actuals (with paperwork) less than 10 lbs per day of VOC; and
- 2) Each source emits less than 1 ton per year of HAP.

Maverick's application states that the facility would emit 1.55 lbs/hr controlled/actuals (which could be more than 10 lb/day) and would emit 6 tons of HAP controlled per year, mostly from the compounder unit. Based on this, EPA believes that the de minimis provision should not apply to the compounder unit and issuing a PTI was the correct action.

EPA does not plan to take further action against Maverick at this time and asks that Ohio take whatever action it deems appropriate.

Lastly, Maverick submitted a permit application to Ohio in late 2014. EPA cautions against using that application since Maverick has made, or will be making, changes at its facility that affect its control efficiency. EPA believes these changes will increase control and reduce emissions, and should be considered when setting limits, monitoring, and other terms of the permit. EPA suggests getting more information to supplement the existing application.

Let me know if you'd like to discuss,

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